



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

**for the NPDES/SDS General Small Municipal Separate
Storm Sewer System (MS4) Permit MNR040000
reissued with an effective date of August 1, 2013**
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: Brockway Township *County: Stearns
(city, county, municipality, government agency or other entity)
*Mailing address: 43710 85th Avenue
*City: Rice *State: MN *Zip code: 56367
*Phone (including area code): 320.393.3770 *E-mail: cpesta@clearwire.net

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Douvier *First name: Duane
(department head, MS4 coordinator, consultant, etc.)
*Title: Township Supervisor
*Mailing address: 43710 85th Avenue
*City: Rice *State: MN *Zip code: 56367
*Phone (including area code): 320.290.4853 *E-mail: duanedouvier@gmail.com

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: _____ First name: _____
(department head, MS4 coordinator, consultant, etc.)
Title: _____
Mailing address: _____
City: _____ State: _____ Zip code: _____
Phone (including area code): _____ E-mail: _____

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

- ☒ Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Duane Douvier
(This document has been electronically signed)

Title: Township Supervisor / Stormwater contact Date (mm/dd/yyyy): 12.27.13

Mailing address: 43710 85th Avenue

City: Rice State: MN Zip code: 56367

Phone (including area code): 320.290.4853 E-mail: duanedouvier@gmail.com

Note: The application will not be
processed without certification.

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☐ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Stearns County Environmental Services Provides for stormwater permitting process and warranties in addition the Township's for follow-up and restoration if necessary	MCMs 4, 5 as well as the regulatory language with Brockway Township in a Memorandum of Understanding document. Please refer to our Township website, www.brockwaytownship.govoffice.com and click on to "Ordinances" and highlight the documents called: 1. Memorandum of Understanding, Ordinance No. 1 Land Use and Zoning and Ordinance No. 2 amending No. 1 In addition, you can go to www.co.stearns.mn.us and click on to "Document Library" and go down to Ordinances and click on to "County-Township MOUs for the section above." and then click on "Ordinances-Ordinance 439 for the sections below: 2. Stearns County Land Use and Zoning Ordinance No. 439, Sections 7.25 Stormwater Management and 7.10.2 Erosion and Sediment Control
Mississippi River Renaissance Project Public Outreach with materials, site visits and education	MCMs 1, 3 Materials on file with the Township. Site education and workshops are identified on our website.

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

Brockway Township has a Memorandum of Understanding with Stearns County in which the Stormwater Management Section 7.25 and Section 7.10.2 Erosion and Sediment Control of the Stearns County's Ordinance No. 439, and their successor Ordinances' apply to the Township.

In addition, Brockway Township has a sample Developer's Agreement in which stormwater and erosion control plans are required to be designed by the Developer's Engineer with review by the Township Engineer and warranties required.

Lastly, on December 27th, 2013 following adoption of the summary, the Township now has a new Illicit Discharge Ordinance which will go online after January 1, 2014 under Ordinances for viewing. When the new web page has been designed, it will be available for review there.

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☒ Contract language
☐ Policy/Standards ☒ Permits

☐ Rules

☐ Other, explain: Developer Agreements / successor and assigns after project is done or sold

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Please refer to our Township website, www.brockwaytownship.govoffice.com and click on to "LAND USE ISSUES" and highlight the documents called:

1. *Developers Agreements*
2. *Brockway Township Developer's Agreement Surety Sheet Exhibit B*
3. *Ordinance No. 1 Land Use and Zoning and Ordinance No. 2 amending No. 1*
4. *Stearns County Land Use and Zoning Ordinance No. 439, Sections 7.25 Stormwater Management and 7.10.2 Erosion and Sediment Control*

Direct link:

1. *www.brockwaytownship.govoffice.com Ordinances and click on Illicit Discharge Ordinance Brockway Township No. 4 adopted December 13th, and the adoption summary published on December 27th, 2013.*
2. *county.stearns.mn.us/OnlineServices Document Library*

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg.*

2. If no:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If yes:

- a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☒ Contract language

☐ Policy/Standards ☒ Permits

☐ Rules

☐ Other, explain: Developer Agreements in effect before, during and after construction

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Please refer to our Township website, www.brockwaytownship.govoffice.com and click on to "LAND USE ISSUES" and highlight two documents called:

1. *Developers Agreements*
2. *Brockway Township Developer's Agreement Surety Sheet Exhibit B*
3. *Click onto the Stearns County website @ www.co.stearns.mn.us and click onto the following in the Document Library: Ordinance No. 439 and to the sections listed: Stearns County Land Use and Zoning Ordinance No. 439, Sections 7.25 Stormwater Management and 7.10.2 Erosion and Sediment Control*

Direct link:

1. *www.brockwaytownship.govoffice.com Ordinances*
2. *county.stearns.mn.us/OnlineServices Document Library*

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg.*

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐ Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Brockway Township will review and update their construction site stormwater runoff control regulatory mechanisms to be at least as stringent as the MPCA CSW permit. This effort will be completed within 12 months of the date permit coverage is extended.

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | |
|--|---|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. BMP maintenance | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

While Brockway Township has only culverts and minimal stormwater pond management and lately very little development, the Township will work with an Engineer to develop the following above tasks in C1 - C8 to assure that, within 12 months of the date permit coverage is extended, these permit requirements are developed and implemented below in a regulatory mechanism format for permitting purposes:

C1: BMPs to manage and minimize erosion: Sample language: Sediment Control. Development of language to deal with pre-construction phasing, use of buffer strips, and slope grading, inspections and all of the required maintenance for stormwater. Stabilizing of all exposed soils and areas with a period of one weeks. Exposed stockpiles or opened steep slopes must also be considered for stabilization during project construction. Stabilization procedures and allowed products to be identified. Post construction controls to be identified including revegetation and removal of silt fencing once drainage areas are planted and working.

C2: BMPs to minimize the discharge of sediment and other pollutants: Sample language: Township will work towards implementation of sediment control practices and employ different methods to prevent sediment from entering the Township's and/or surface waters. Identification of the parameters for these practices will include the various known methods to accomplish this during construction and for a period after until regrowth and vegetation is accomplished. The Township will review all of the present tools and use those that will accomplish their goals and objectives for the projects that they or a Developer will implement.

C3: BMPs for dewatering activities: Sample language for dewatering activities. Implement BMPs to address turbid(muddy or rapidly moving waters) related to dewatering or draining during construction to a temporary basin on site. Oversight activity by the Township to make sure that the water discharged to a temporary basin is treated to prevent a nuisance or harm to the area or downstream later. Identify if there are wetlands on project property and provide for draining to said wetlands in order to preserve them. All backwash water to be removed off site and not placed in temporary basins.

C4: Site inspections and records of rainfall events: Sample language: Township will train or employ a trained party to inspect construction sites on a regular basis (every 7-10 days) or after a rainfall event that is greater than .5 inches in a twenty-four hour period. Said inspections will be documented in detail and placed on file with the existing project or in a spreadsheet base for reference. Where there are nonfunctioning or damaged stormwater conveyances, repairs will be completed and documented as such. Construction site exits will be monitored for sedimentation tracking and removal and clean-up will be the responsibility of the project owners.

C5: BMP Maintenance: Sample language: The Township will develop written policies to use for inspections and maintenance which will document the details, who did them and what was found during project construction and roadway culvert installations. If there are any issues with improper findings, identified corrective actions will be taken and documented accordingly. Amendments to any site plans regarding stormwater and/or erosion control measures will be approved by all parties and signed off by all and placed in the files. Final reviews will be used for compliance and annual reviews to be used to make sure that there is sustained compliance. Annual documentation will be with the Stormwater and road records when reviews are completed.

C6: Management of solid and hazardous wastes on each project site: Sample language: The Township will develop language insuring compliance with solid and hazardous waste products by the following methods: Steps used to minimize contact with any stormwater conveyances, dikes around any products needed on the site to prevent seepage, restricting access to storage areas for only the necessary parties, and meet all necessary rules and regulations in accordance with Minnesota Rule Chapter 7035. Township will develop a training document and response call system to deal with spills according to Minnesota Statute 115.061 and require all contractors to have materials available in case of a spill. All concrete washouts, etc will be done in an appropriate manner in appropriate containment washout facility. Final close out of a project will have a punch list to ensure compliance with MN Rule Chapter 7035.

C7: Stabilization upon completion of construction activity and establishment of vegetative covers: Sample language: Township will develop language to ensure final stabilization of the project site inclusive of soil revegetation and that regrowth is well established, that if a permanent stormwater structure is necessary that it will meet all of the requirements for design, operations and maintenance. For residential construction, that the necessary lots have revegetation stabilized and growing and that the lot is sold with the knowledge that the landowner protect any necessary structures left. For agricultural projects, that the land is restored to its preconstruction agricultural use when completed.

C8: Criteria for the use of temporary basins: Sample language: Temporary basin criteria. That when ten (10) or more acres of a disturbed construction site drain to a common area, the Permittee(s) will construct a temporary sediment basin to provide the necessary treatment before it leaves the site. That this will include sites where the soils are highly erodible and/or with steep slopes. That removal of the temporary basin to a permanent basin is done when construction is complete and vegetation is in place.

Post-construction stormwater management

A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?

☒ Yes ☐ No

1. If yes:

a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☒ Contract language

☐ Policy/Standards ☒ Permits

☐ Rules

☐ Other, explain: Developers Agreements when a new development is planned.

b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Please refer to our Township website, www.brockwaytownship.govoffice.com and click on to "LAND USE ISSUES" and highlight two documents called:

1. Developers Agreements

2. Brockway Township Developer's Agreement Surety Sheet Exhibit B

3. Stearns County Land Use and Zoning Ordinance No. 439, Sections 7.25 Stormwater Management and 7.10.2 Erosion and Sediment Control

Direct link:

1. www.brockwaytownship.govoffice.com Ordinances

2. county.stearns.mn.us/OnlineServices Document Library

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: MS4NameHere_PostCSWreg.

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No

2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):

- a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
- b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
- 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
- a. Limitations
- 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☐ Yes ☒ No
4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity ☐ Yes ☒ No

for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e).

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☒ Yes ☐ No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☒ Yes ☐ No
 - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

Schedule for added language to regulatory Ordinance language for permitting purposes:

B2 a & b: Brockway Township has not done stormwater regulatory language (other than in the Developer Agreements) for post construction stormwater management due to the low volume of developments in the Township; however, the Township will work with the Township Engineer to develop such practices consistent with low impact development in the Township. Language to be completed by fall of 2014 and incorporated into the Agreements and possible into the Stearns County Stormwater Permit Issuance as necessary.

B3 1,2 & 3: Brockway Township will amend the Agreement and / permit issuance to contain the above language in this section on the same schedule as identified above.

B4 - All: Again, Brockway Township does not have the need for some of this language; however, the Township will work with the Township Engineer to develop language, on the same schedule, to be applicable to any future developments.

B5 c: Brockway Township will amend the Agreement and/ or permit issuance to contain the above language in this section on the same scheduel as identified above.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☒ Yes ☐ No
- 1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
 - 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

- B. Describe your ERPs:

Brockway Township uses language in the Developer's Agreement and the sureties to deal with enforcement of a permit. It is further included in their new Illicit Discharge Ordinance which was adopted in 2013. However, the Township will review all of their documents to ensure conformity with this section by the end of 2014.

Link 1: Please refer to our Township website, www.brockwaytownship.govoffice.com and click on to "Ordinances" and highlight the document called: Illicit Discharge Ordinance Brockway Township No. 4. This describes the ERPs for existing uses that need enforcement.

Link 2: Please refer to our Township website, www.brockwaytownship.govoffice.com and click on to "Land Use Issues" and highlight the documents called: *Developer's Agreement and Brockway Township Developer's Agreement Surety Sheet Exhibit B*. These documents deal with the construction when a development is being commenced and the sureties required. This document is the beginning of the process and subject to changes as each development comes into being in the Township. It further identifies, when necessary, who will manage and how stormwater conveyances are dealt with.

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

Townships manages their culvert map and stormwater ponds with biannual reviews and maintenance when necessary.

The driveway map and one set of stormwater ponds are on file at the Township Hall in the Road Repairs book and the Stormwater Files and are updated annually with new projects once they are completed and taken over from the Developer and their development.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Beginning in April of this year, Brockway Township will assign unique Identification numbers to all stormwater culverts and stormwater detention ponds and set up a recordkeeping spreadsheet system. Project to be completed within twelve months from issuance of Permit.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☐ Yes ☒ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☒ Yes ☐ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☐ Yes ☒ No
2. A geographic coordinate. ☐ Yes ☒ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☐ Yes ☒ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

While Brockway Township is not aware of any facilities for Item C1, within twelve months from the date of issuance of the Permit, Brockway Township will work with their Township Engineer to identify the above items listed in C & D and to complete the work for addition to the recordkeeping system.

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

Brockway Township is a very small MS4 with no large type of municipal facilities. Brockway Township has only done public education and outreach with the residents of the town. More focus has been on illicit discharge, erosion control and permitting when working with developers and landowners as they are developing property. At that point, engineers and warranties are used to protect the land use and to make sure stormwater and erosion control methods are properly implemented and done. Recently, the Township has adopted and published an Illicit Discharge Ordinance [date of 12.27.13].

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Informational brochures placed on tables at Township Annual Meetings encouraging good management practices / attracts approx.100 residents	Done in March of every year. Note how many are gone.
Recycling day	Was done three times / heavy participation
Hazardous waste pamphlets / posting board and handed out	Visible reduction in ditches of Brockway Township
Annual Township Newsletter	Stormwater overview done.
Wall posters	Relevant items in the spring / fall
BMP categories to be implemented	Measurable goals and timeframes
Brockway Township website stormwater page to have the following items: education, hotline, annual audits, permit, notices regarding education workshops, hazardous waste disposal facilities, etc.	Set up by June, 2014 / provide counter to track interest in materials placed online to see if there are specific interests.

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brockway Township Supervisor / Stormwater designate

Also Brockway Township Zoning Administrator

Also Brockway Township Clerk

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

Brockway Township has asked for input from residents when there is an issue that involves their property and annually at the Township Meeting of the Town.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs.

Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).
If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Township Annual Meeting / Stormwater portion to discuss any new measures, rain gardens, ditching, etc.	Public meeting held / people in attendance noted.
Access to all documents inclusive of Annual Reports, education, workshops and brochures. Occasionally speakers have come in.	People in attendance / questions noted and materials taken.
BMP categories to be implemented	Measurable goals and timeframes
Written Responses to SWWP document and presentations	Set up a mechanism for review and comment via the website by July, 2014.
Stormwater Workshops	To be placed on the Township website when known along with any grant funding for shoreline and restoration activities.

3. Do you have a process for receiving and documenting citizen input? ☒ Yes ☒ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The website has a way to ask questions and the Township can respond to them. There has been no direct stormwater request other than roads and ditch issues that are ongoing. A road plan is in place to begin reconstruction when necessary, inclusive of culvert replacement and stormwater measurements as well as any corrections to elevations before repaving of Township roads.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brockway Township Supervisor / Stormwater Designate

Brockway Township Zoning Administrator

Brockway Township Clerk

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

Brockway Township has two Ordinances that can work towards IDO problems. One is the Illicit Discharge Ordinance and the other is the Right Of Way Ordinance dealing with any work done in the Township's Rights of Way. Both have violation procedures and options for restoration and/or repair at the Owner's expense. Lastly, the Township implements Developer Agreements that have language regarding any illicit stormwater uses and restoration where necessary. The intent will be to make them stronger in their language.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

- Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☒ Yes ☐ No
- Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No
- Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and ☐ Yes ☒ No

reporting illicit discharges for further investigation.

- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No
- e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☒ Yes ☐ No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☐ Yes ☒ No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☐ Yes ☒ No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

2 C,D,F,G: Brockway Township has just implemented an ordinance that prohibits illicit discharges and connections, The Township will implement a program to provide training for staff and the necessary protocols and procedures relating to identification of possible illicit discharges, reporting procedures and steps for reporting, and the necessary corrective actions to be used. The Township will have the revisions ready by fall of 2014 for incorporation into the 2014 annual report.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Illicit Discharge Ordinance	Completed and in place 12.27.13
Developer Agreements with warranties	Completed and in place since 2008 / used with developments
Land Use Ordinance / MOU with Stearns County	Enforcement procedures in Ordinance
BMP categories to be implemented	Measurable goals and timeframes
More detailed investigation and follow-up procedures with a process for correcting actions / review of the items in No 2 c,d,f,g	Follow-up with recordkeeping procedures and biannual review in May and October of each year. To be completed by fall of 2014.
Establish Illicit Discharge Reporting Process	Place a number on the website and/or comment spot whereby they can report an illicit discharge. All calls/or written comments will be kept on file for a period of three years. This will be implemented by July, 2014 on the new stormwater page.

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

Set up procedures and put in place the above by Fall of 2014. Status reports to begin in October, 2014.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brockway Township Clerk

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

As stated earlier in this document, Brockway Township presently only deals with one stormwater pond given to the township, observes three other ponds privately owned, and the ditches with culverts in the Township's Rights of Way. The Township manages these issues through a Developer's Agreement with warranties and by coordinating with Stearns County.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No
 - Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No
 - Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No
 - Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
 - Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No
 - Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☒ Yes ☐ No
 - Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No
 - Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☒ Yes ☐ No
 - Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☒ Yes ☐ No
 - Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

2C: Brockway Township will implement a hotline and/or website comment site for the public to use to report noncompliance with stormwater activity. To be completed with the website in June, 2014

2 D1,2 & 4: In coordination with Township Engineer and Attorney, Brockway Township will identify and implement procedures for the following section within 12 months of the date permit coverage is extended.

2 g: Brockway Township will incorporate construction site inspection checklists and other written materials to be used in conjunction with subdivision applications and agreements within 12 months of the date permit coverage is extended.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Developer's Agreements whenever a new development is implemented in the Township	Township Engineering reviews, site reviews, inspections and oversight during construction and final approvals.
Warranties held for a period / Documents recorded for responsibilities for the stormwater facilities.	Annual review of existing stormwater ponds for illicit discharge and/or repairs needed. Assess to Developer and property owner if needed.

BMP categories to be implemented	Measurable goals and timeframes
Public Documentation / hotline	Add a public input comment and/or phone number on Brockway Township website for stormwater problems and/or comments. To be completed by July, 2014
Temporary Sediment Basins	Written language to be inserted into Developers Agreements and other documents to clarify the use and removal of sediment basins and other silt fencing at completion of projects. To be completed by Fall of 2014
Criteria 1,2 & 4 and g. Implement written policies and procedures for the above criteria when a project comes into the Township and incorporate said policies and procedures in all documents. If required, hold the necessary public hearing for the rules to be adopted.	Measurable goals would happen when a development is started and completed. Language to be in documents by October 2014 The only other time that measurable goals will be used is during road construction and/or large culvert replacements with documentation when they are done.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brockway Township Supervisor / Stormwater Designate

Brockway Township Zoning Administrator

Brockway Township Clerk

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

Brockway Township uses an Engineer to review the Developer's proposed stormwater construction activities to insure proper installation and operation as required. Through the Developers' Agreement language, the details of the actions below are normally established along with warranties and procedures should the Developer does not follow through.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☒ Yes ☐ No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☒ Yes ☐ No
- b. All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☒ Yes ☐ No
- d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

While Brockway Township has some of the details for the Criteria in 3 a and b when developments happen, Township will ask the Township Engineer to review and recommend further detail to fulfill the above for a more detailed program. Place this documentation with a Developers' Agreement, and identify this in our regulator language where necessary. To be completed by December, 2014.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s*

(<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Funding long-term O & M of stormwater management system and program for Township.	Development of Road & Bridge budget / repairs and maintenance and through levy upon property owners where necessary.
Site Plan reviews	Completed by Township Engineer who reports back to Town Board during the project and before release of final funds.
Annual Township site reviews	Documents annually the condition of the ponds and culverts. Develops a work plan to repair and fix any necessary issues through the Township road and bridge budget.

BMP categories to be implemented	Measurable goals and timeframes
Prepare a checklist when reviewing stormwater plans inclusive of pre, during and post design work inclusive of photos, serial unique numbers and the particular size and type of stormwater materials used.	Review by others for completeness prior to implementation of checklist on a project. Checklist to be implemented in June, 2014
Determine the acreage of land conserved under easements and conservation easements within the Township.	Work with Stearns County and GIS system to identify and review when looking at land use rules and regulations. Identify by Fall, 2014 and review Ordinances by Jan, 2015.
Prepare a document log for review and any repairs for the stormwater conveyances in the Township inclusive of who, what, where, when and what was done. Enter into a spreadsheet for an annual review.	To be completed and implemented by June, 2014 in concordance with the checklist above.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brockway Township Supervisor / Stormwater Designate

Brockway Township Engineer

Brockway Township Zoning Administrator

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

Brockway Township actually bi-annually inspects all of their roads and culverts in place and annually inspects the one trout stream that goes to the Mississippi River, one stormwater pond that the Township is responsible for and two private ponds that are in the Township .

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☒ Yes ☐ No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:
- Along with the Stormwater Mapping and Identifier number, Brockway Township will add a stormwater pond facility inventory with the same unique identification number. Pictures and documentation will be placed in the files annually to show the status of the facilities. Written procedures to be completed by January 2015.*
4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annually during road review / replace culverts, clean and repair and review existing stormwater ponds	Biannually reported in meeting minutes of the Town.
When construction and/or subdivision work is initiated, soils and DWSMA areas are identified.	Township does Findings of Fact on the projects.
Annual inspections of stormwater facilities	Done is spring of each year in April or May. Captured in Meeting minutes of the Town.
BMP categories to be implemented	Measurable goals and timeframes
Annual written report / checklist of inspections to files inclusive of pictures and what, if any work will need to be done on a stormwater and/or ditch and culvert repairs and replacements.	Report forms / complete by April, 2014
Work list showing date, time and recording of repairs (inclusive of pictures and costs) when completed.	Report forms / complete by April, 2014

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☐ Yes ☒ No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☐ Yes ☐ No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☐ No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☐ No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☐ Yes ☒ No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? ☐ Yes ☒ No
- b. Covers the requirements of the permit relevant to the duties of the employee? ☐ Yes ☒ No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Within twelve months from the date permit coverage is extended, Brockway Township will do the following:

No. 6: Develop procedures and a working schedule for determination of the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed for the purpose of stormwater treatment.

No. 7: While we have some inspection procedures, Brockway Township will add to the bookkeeping spreadsheet and files a section for review of all structural stormwater points and outfalls, and stockpiles, storage and material handling areas within their authority.

No. 8 a,b & c: The Township will implement a training program on the inspections, record keeping, and any techniques required to manage and maintain stormwater ponds, culverts and how to deal with illicit discharges.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Brockway Township Supervisor / Stormwater Designate

Brockway Township Zoning Administrator

Brockway Township Road Manager

Brockway Township Clerk

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No

1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program